

Speak Up Policy

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Speak Up Policy

1. Why this Policy?

We are committed to conducting our business with honesty and integrity. We care for each other, our partners, customers and suppliers, society and our environment. We promote an open culture of trust and communication where violations of local laws, regulations and our policies, including the Code of Conduct, are not tolerated.

Reporting your concerns and violations, even if you only suspect them, is essential for us to live up to that commitment, maintain our reputation, ability to operate and make JET a better place to work and a better corporate citizen. We want you to feel encouraged and supported to Speak Up when something isn't right. Speaking Up makes a difference!

2. Who can Speak Up?

In this Policy, the words “JET”, “we”, “our”, and “us” refer to Just Eat Takeaway.com N.V. and all its subsidiaries and affiliates across the world, except for Grubhub Holdings Inc. (“Grubhub”) and Grubhub’s subsidiaries or affiliates.

Whether you're an employee, an independent contractor, a supplier, a partner, a shareholder, a customer, or a relative of any of the above, you can use this Policy to Speak Up.

3. What do we mean by "Speaking Up"?

You'll be "Speaking Up" if you tell us about any (possible) violation, even suspected, of laws, regulations, our Code of Conduct or any other unethical conduct related to JET. A non-exclusive list of examples:

- Bribery
- Fraud
- High risk attitudes to someone's health and safety
- Sexual harassment
- Discrimination
- Bullying
- Misuse of substances
- Conflicts of interest
- Risk or actual damage to the environment
- Modern slavery
- Market abuse
- Someone covering up wrongdoing

Do not use this Policy:

- If someone's life or safety is in danger. If you need emergency assistance, please contact your local emergency services.
- If you're an employee, and you have a grievance related to your terms of employment, please contact your local HRBP.
- To settle personal or legal disputes.
- To make accusations which you know are false. If you act in bad faith this may have consequences for you as it is considered a Code of Conduct violation.
- If you had an issue with your order (e.g. your food was cold or not delivered).

4. How can you Speak Up?

Method	Channel
In-person	If you work at JET, you can always contact your line manager or HRBP directly to report a concern. If they don't address your concerns, are part of the concern you want to raise, or otherwise you don't feel comfortable involving them, you can reach out to any member of the Ethics & Compliance team directly.
Email	You can always email the Ethics & Compliance team to report your concern or in case you have any questions. Drop them a line at compliance.global@justeattakeaway.com
Speak Up hotline	You can use our Speak Up hotline (externally referred to as Ethics hotline) to raise your concern online or by phone. The Speak Up hotline is a service operated by an external and independent organisation.

	<p>You can find links to our Speak Up hotline website here, on the Kitchen (our intranet) or on any of the platform websites for the countries in which we operate.</p> <p>You can also use our Speak Up hotline to report your concern by phone. Telephone numbers are available for every country and can be reached 24/7, 365 days a year.</p> <p>The Speak Up hotline supports over 340 languages, so you can submit your report online or by telephone in whichever language you prefer. If you make a report via the Speak Up hotline, you can choose to give your name or to remain anonymous.</p>
External reporting	<p>We want to reassure you that Speaking Up internally is strongly encouraged, and this should always be your first step. In special circumstances you can directly go to a regulator, or if you've exhausted all internal procedures you might even want to report your concern externally. You are under no obligation to Speak Up internally first if you report something to a regulator, and you do not need to tell us if you have spoken up externally.</p> <p>We strongly recommend you seek independent and impartial advice from a trusted organisation or body before Speaking Up outside of JET. That way you can get the support you need to make an informed decision.</p>
Grubhub	<p>If you want to Speak Up about a concern relating to Grubhub, you should visit Grubhub's hotline.</p>

5. How will you be protected if you Speak Up?

By Speaking Up, you protect our company and your colleagues. So when you Speak Up, we protect you from retaliation.

Retaliation can take many forms, including a demotion, reduced hours, decreased pay or job assignments, or being harassed or even threatened. Retaliation is luckily quite rare but, where it does happen, it's usually carried out by individuals who know about or are involved in an investigation.

Retaliation is prohibited by law and never tolerated at JET. If you experience something that doesn't seem right, or you are feeling concerned that you may be experiencing retaliation, please tell us as soon as you can. Don't wait to see if you can gather evidence or if the situation gets worse; just tell us if you have any suspicions or concerns, and we will help.

6. How will you be protected if you are investigated?

If you are alleged to be responsible for wrongdoing, you are the subject of an investigation. If you are the subject of an investigation, your employment rights and right to privacy will be carefully considered. If there's an investigation, you will be informed about the allegation (not about the reporter of the allegation) and will be provided the opportunity to comment on the allegations. If the investigation finds no evidence that justifies taking measures against you, you will be protected from any negative effects. The same protection applies for those who are subject of reports made in bad faith. If evidence of wrongdoing is found

and measures are taken, you are protected from unintended negative effects that go beyond the objective of the measure taken.

7. Confidentiality and anonymity

We handle reports confidentially and we will do as much as we can to ensure that your identity is protected, whether you're someone who's spoken up, a witness, or someone accused of wrongdoing. Confidentiality is always our top priority. This means that your information will only be shared with a limited number of people on a strict need to-know basis. Information will only be disclosed outside this group if we are required to do so by law or an important public interest is at stake. If you've named anyone when raising your concern, we will never inform them that you're the person who has named them. We are committed to protecting the privacy of everyone involved in an investigation. We will do everything to safeguard your personal data and will use it only for the purposes of conducting a fair investigation and to comply with legal requirements.

We require anyone who is part of an investigation to maintain confidentiality and not to share or discuss information in relation to any case with others outside of the Ethics & Compliance team.

While we understand there might be situations where you feel you have no choice but to remain anonymous, anonymous reports are harder for us to investigate and make it more difficult for us to adequately support you. Please be reassured that we will not tolerate retaliation of any kind against you where you have raised a concern to us.

Please raise your concern as soon as possible - don't hold off because you feel you need to gather evidence. If you have a reasonable suspicion that something's up, Speak Up!

8. What kind of information do you need to provide?

When you Speak Up, it's really helpful if you can provide as much detail in your initial report as possible. This enables us to act quickly and make sure we can conduct our investigation effectively.

When making a report, it is helpful to provide at least:

- A detailed description of the (suspected) wrongdoing;
- The time period in which the (suspected) wrongdoing occurred;
- The location in which the (suspected) wrongdoing occurred;
- The name of the person(s) involved in the (suspected) wrongdoing;

9. Who will investigate the issue?

The Ethics & Compliance team reviews the report and assigns it to the right team or person to investigate. They usually review and assign a report less than 24 hours after receiving it.

- Your local HRBP or Employee Relations team will be responsible for investigating HR-related reports, such as harassment, discrimination or intimidation.
- The relevant logistics team will investigate reports made by or about couriers.

- Other reports, such as those relating to information security, fraud, or privacy concerns, are investigated by a senior member of the relevant team.
- The Ethics & Compliance team will conduct investigations into all high and critical severity level cases, regardless of topic.
- If any member of the Legal & Compliance team or the Company Secretary & General Counsel is named in an allegation, they will not be involved in conducting the investigation. If this happens, the report in question will be referred to the VP Internal Audit, who will appoint a case investigator.
- If you are based in Italy, your report will also be reviewed by the Italian supervisory body.
- An investigator may decide, after consultation with the Director Compliance and Company Secretary & General Counsel (or the VP Internal Audit for reports related to the Legal & Compliance team), to involve external investigators. External investigators must be part of a professional body, such as lawyers, auditors, or accountants. They can either play a supporting role as a co-investigator, expert advisor or interview attendee or, if appropriate, may take on the investigation as the lead investigator.

10. What happens next?

We will acknowledge receipt within seven days of raising your concern. If you reported a concern anonymously via the Speak Up hotline, you can check the Speak Up hotline website or call them via one of the numbers referenced above to receive progress reports and to support the investigation.

When an investigation has concluded, a decision will be taken whether any follow-up actions are required by our appropriate level of management. If we have found evidence of wrongdoing, the follow-up might include amongst others (i) disciplinary action in line with JET's Disciplinary Policy, (ii) passing details onto law enforcement, and/or (iii) changes to our policies and procedures to prevent similar issues from arising again in the future.

If a violation of law or external regulations is confirmed, we may be required to report or notify the violation to relevant (local) enforcement authorities, such as police or regulatory authorities, in order to comply with the relevant law or regulation. We also have the right to start a separate legal action against the person(s) or party in question.

We will reach out to you with the overall results of the investigation. For privacy reasons, no specifics can be shared with you concerning actions taken against the person(s) involved. We aim to follow up in a timely manner and to share the overall results within three months after receiving your report.

11. Where to go for advice?

There are a few places you can go if you're not sure about whether to flag something or who to go to. If you want to talk to someone at JET, try your line manager, a member of the HRBP or Employee Relations team, or the Ethics & Compliance team.

12. We investigated, but you're not happy. What can you do about it?

If you aren't satisfied with the investigation or the actions taken, please contact the VP Internal Audit. The VP Internal Audit will review the investigation and can decide to open an appeal case. If they decide to do so, they will appoint an appeal case investigator.

13. What does Speaking Up mean for personal data?

We comply with applicable data protection and privacy rules related to the protection of personal data. Any personal data obtained through the Policy will be processed in accordance with privacy rules applicable to JET, as well as the JET Privacy Statement and Privacy Policy. Personal data will be processed solely for the purpose of completing the investigation process and in order to comply with our legal obligations. We retain personal data only as long as required after you Speak Up or to comply with applicable legal requirements. For more information about how we process personal data, read our Privacy Statement. If you have any questions, contact the Group Data Protection Officer or Director Compliance.

14. Monitoring and review

This Policy is monitored by the Ethics & Compliance team. This Policy will be reviewed at least annually.

Version	Amended by...	Date	Approved by ExCo Member
2.0	Alice Drain	11/02/2021	Sophie Versteeg
3.0	Anastasia Avramenko Vincent Koorstra	27/09/2022	Sophie Versteeg
4.0	Anastasia Avramenko Vincent Koorstra	20/12/2023	Sophie Versteeg